

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2020-265-E**

IN THE MATTER OF:

Duke Energy Progress, LLC's Establishment  
of Solar Choice Metering Tariffs Pursuant  
to S.C. Code Ann. Section 58-40-20

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**PETITION TO INTERVENE  
BY NUCOR STEEL –  
SOUTH CAROLINA**

Nucor Steel-South Carolina ("Nucor"), a Division of Nucor Corporation, pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Duke Energy Progress, LLC ("DEP"), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars per year. Since the cost of electricity comprises one of the major costs of Nucor's manufacturing process, electric costs directly affect Nucor's ability to continue to produce steel at a competitive price.
2. In compliance with Act 62, DEP seeks Commission approval of new solar choice metering riders and rate schedules. Nucor has a stake in, and will be directly and substantially affected by, the outcome of this proceeding. Due to the magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. At this early stage in the proceeding, Nucor has not fully determined what position it may take and how long it will take to complete its presentation and any cross-examination during the hearing established in this proceeding. Since 1987, Nucor has actively participated in many previous proceedings before this Commission.
3. Nucor's mailing address is:  
Nucor Steel – South Carolina  
P.O. Box 525  
Darlington, SC 29532

4. Nucor will be represented in this proceeding by the firm of Moore & Van Allen, PLLC. Service and correspondence regarding this proceeding should be sent to the undersigned.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

MOORE & VAN ALLEN, PLLC

A handwritten signature in black ink, appearing to read "Rob Smith", written in a cursive style.

Robert R. Smith II

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Counsel for Nucor Steel – South Carolina

Dated: November 25, 2020

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

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SOUTH CAROLINA**

This is to certify that the foregoing document was served upon the following parties at  
the addresses set forth by first-class or electronic mail on this the 25th day of November, 2020:

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A handwritten signature in black ink, appearing to read "R. Smith II". The signature is stylized with a large, sweeping "R" and a clear "Smith II" following it.

Robert R. Smith II